## 4-19M/139 AFFIDAVIT IN SUPPORT OF APPLICATION FOR ISSUANCE OF ARREST WARRANT

Your affiant, Eric R. Jones, being dully sworn and deposed, states the following:

- 1. Your affiant is a Special Agent for the Department of Homeland Security, Homeland Security Investigations (HSI) since August 2002. Your affiant is currently participating in the investigation of a heroin, cocaine and marijuana distribution organization operating in the Hampton Roads area of Virginia. This drug trafficking organization (DTO) is led by REGINALD HAYSPELL. During the course of this investigation, it has been determined that this DTO is supplied cocaine from DWIGHT WILLIAMS a source of supply located in Maryland. The narcotics distribution occurring in the Eastern District of Virginia (EDVA) appears to be primarily coordinated by REGINALD HAYSPELL and STEVE MUNDELL with additional distribution being conducted by QUINTON JONES, DWAYNE CLARK and SELWYN CLARKE.
- 2. Your affiant makes this affidavit in support of an application for an arrest warrant for the following individual:
  - a. DWIGHT WILLIAMS
  - b. QUINTON JONES
  - c. DWAYNE CLARK
  - d. STEVE MUNDELL
  - e. SELWYN CLARKE
- 3. This request for an arrest warrant is made in relation to the following offenses occurring in the Eastern District of Virginia (EDVA) and elsewhere:
  - a. Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance, in violation of Title 21, U.S.C., Sections 841 and 846

## FACTS AND CIRCUSTANCES

4. Since this affidavit is being submitted for the limited purpose of securing authorization for a search warrant, your affiant has not included each and every fact which is known to the investigative team concerning this investigation. Rather, your affiant has set forth only those facts that are believed to be necessary to establish probable cause to search the aforementioned location. Facts not set forth herein are not being relied upon in reaching the conclusion that an arrest warrant

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should be issued. Nor is it requested that the Court rely upon any facts not set forth herein in reviewing this affidavit.

- 5. Your affiant has personally participated in the investigation of the offenses described in this affidavit. As a result of your affiant's participation in this investigation and a review of reports made to your affiant by other members of the investigative team, your affiant is familiar with the circumstances of this investigation. On the basis of this familiarity, and on the basis of the other information which I have reviewed and determined to be reliable, your affiant alleges the following: FACTS AND CIRCUMSTANCES
- 6. On May 3, 2019, Steve MUNDELL traveled from Atlanta, GA to Richmond, VA and rented a car at the Richmond Airport and drove directly an address on West Mercury Blvd, Hampton, Virginia. A reliable confidential source (CS-1) advised that MUNDELL and HAYSPELL discussed MUNDELL obtaining 2 kilograms of cocaine that MUNDELL planned to distribute. CS-1 advised that HAYSPELL informed MUNDELL "It's in the back, the passenger door...the back-passenger seat". MUNDELL asked HAYSPELL "Which car you in? HAYSPELL responded "The little truck...you know where I park at man".
- 7. MUNDELL was followed from West Mercury Blvd, Hampton, Virginia to a residence in Hampton, VA. MUNDELL distributed the 2 kilograms of cocaine to an individual. After the delivery CS-1 advised that MUNDELL told HAYSPELL that one of the kilograms the cocaine was of poor quality.
- 8. On August 10, 2019 investigators involved in the Virginia investigation learned from CS-1 that HAYSPELL and an unknown male referred to as "Jump Rope" traveled to Potomac Mills, Virginia from Anne Arundel County, Maryland to deliver approximately five kilograms of suspected heroin and/or cocaine. Law enforcement in Virginia have determined that "Jump Rope" was the supplier of large amounts of heroin and cocaine to a distribution network in Virginia and possibly resides in Anne Arundel County, Maryland.
- 9. Based on the above facts, investigators in Virginia believe HAYSPELL and "Jump Rope" are involved in this ongoing heroin and/or cocaine distribution conspiracy in the greater Hampton Roads area to include the City of Virginia Beach as well as Anne Arundel County Maryland.
- 10. Anne Arundel County police, with the use of electronic surveillance, located the phone utilized by "Jump Rope" containing the phone number 443-571-4417 in the area of East Wheat Mill Court, Millersville, Maryland. Your affiant conducted various database searches in an attempt to identify the unknown male using the phone. Records indicated that Dwight Darwin WILLIAMS, was listed as the subscriber on the utility bill for the residence. A search through law enforcement databases indicated that in September 2003, WILLIAMS was charged with Possession With the Intent to Distribute (PWITD) cocaine, and in January 2002, WILLIAMS was charged with Controlled Dangerous Substance (CDS) possession (marihuana), two counts of PWITD, CDS Possession (not marihuana), and Drug Trafficking with Firearms. A photograph of WILLIAMS was obtained.
- 11. On August 18, 2019, investigators from HSI/Norfolk learned from CS-1 that Reginald



HAYSPELL and Quinton JONES were discussing collecting drug proceeds. HAYSPELL and JONES decided that JONES would go meet "Jump Rope" possessing phone number 443-571-4417 to obtain additional kilograms of suspected cocaine on the following Tuesday

- 12. On August 19, at approximately 2055 hours, HSI/Norfolk learned from CS-1 that conversations between HAYSPELL and JONES indicated JONES was waiting to collect drug proceeds from an unknown individual. During the conversation HAYSPELL and JONES discussed their narcotics distribution activities.
- 13. On August 20, 2019, at approximately 0212 hours, HSI/Norfolk learned from CS-1 that JONES advise HAYSPELL "The number is 107 bra that I got for DC bra". Investigators believed that JONES was advising he had \$107,000 to give to the subject possessing phone number 443-571-4417 to pay for prior narcotics transactions and also a portion of the upcoming transaction.
- 14. On August 20, 2019, at approximately 1022 hours, HSI/Norfolk learned from CS-1 that HAYSPELL sent to the subject possessing phone number 443-571-4417 a text message "4 of the 31's" which Virginia investigators believed, based upon the investigation to date, was a reference to 4 kilograms of cocaine for \$31,000 per kilogram. At approximately 11:04 a.m., the subject possessing phone number 443-571-4417 responded to HAYSPELL via text message "Aight".
- 15. At approximately 1333 hours, JONES traveled from Richmond, VA and met with HAYSPELL to collect money to be given to the subject possessing phone number 443-571-4417 to purchase kilograms of cocaine. At approximately 1359 hours, CS-1 advised that HAYSPELL told the subject possessing phone number 443-571-4417, "my boy leaving now". Based off of a previous meeting between JONES and the subject possessing phone number 443-571-4417, Virginia investigators believed the subjects were going to meet at Potomac Mills mall in Virginia.
- 16. On August 20, 2019, at approximately 0930 hours, your Affiant, along with other investigators conducted surveillance in the area of East Wheat Mill Court, Millersville, Maryland. Electronic surveillance indicated that phone possessing the number 443-571-4417 was in the area of 605 East Wheat Mill Court. At approximately 1157 hours, investigators observed a greyish green colored BMW SUV, later identified as WILLIAMS' vehicle, leave the area of East Wheat Mill Court and exit the neighborhood. Approximately ten minutes later, the vehicle returned to the neighborhood and drove towards the residence on East Wheat Mill Court. A few minutes later, your Affiant pulled into the court and observed WILLIAMS, who was identified by his MVA photo, standing in the garage of the residence on East Wheat Mill Court. During the course of this travel, electronic surveillance indicated that phone had briefly moved out of the area.
- 17. At approximately 1503 hours, a greyish green BMW bearing MD tag: 93929CF was observed leaving the area of East Wheat Mill Court. The vehicle was followed to the Wawa store located at 8300 Veterans Highway, Millersville, Maryland. A database search indicated the vehicle was registered to Dwight Darwin WILLIAMS, The vehicle pulled into the parking lot of the store and WILLIAMS was observed entering the store alone and he didn't appear to be carrying anything. WILLIAMS was wearing the same green t-shirt containing a green decal that he was wearing when your Affiant observed him standing in the garage of the residence on East Wheat Mill Court. As investigators were watching WILLIAMS at the store, your Affiant drove to East Wheat



Mill Court and observed that the garage door of the residence was closed. After a couple of minutes, WILLIAMS exited the store and entered the driver's side of the vehicle and drove south on Veterans Highway.

- 18. Investigators followed Williams to the Potomac Mills shopping mall in Virginia. Electronic phone pings from phone number 443-571-4417 were consistent with WILLIAMS travel to the mall. While in route to the mall, Virginia investigators learned from CS-1: at 1629 hours, HAYSPELL asked "Jump Rope" (at this time believed to be WILLIAMS) "how far u out bro"? At approximately 1634 hours, 443-571-4417 (WILLIAMS) told HAYSPELL "I don't know why this junk wont text, but I'm less than 4 miles away. I don't want to say no time because of traffic".
- 19. WILLIAMS parked the BMW in the parking lot near the Matchbox Restaurant (approximately 1647 hours) at the Potomac Mills mall. WILLIAMS exited the vehicle alone and did not appear to be carrying anything. He entered the Matchbox Restaurant. It should be noted that WILLIAMS did not make any stops or have any contact with anyone between his departure from the Wawa store and his arrival to Potomac Mills mall. Also, when WILLIAMS was observed exiting the Wawa earlier, he was not carrying the brown box from the store. WILLIAMS was also wearing the green t-shirt he was wearing earlier in the day. WILLIAMS parked next to a silver Lexus bearing Virginia tag: VSW8895. Virginia investigators advised that JONES had previously been observed operating the Lexus.
- 20. At approximately 1730 hours, WILLIAMS, along with the individual the investigative team identified as JONES, who was wearing a red baseball cap, white t-shirt and dark shorts, were observed exiting the restaurant together. Both subjects walked towards their vehicles. Once at the vehicles, WILLIAMS opened the front passenger door of the BMW and retrieved a brown packing box. As he was retrieving the box, JONES retrieved a black bag (possible backpack) from the trunk of the Lexus. WILLIAMS opened the rear passenger door of the Lexus and placed the box inside the vehicle. JONES handed the bag to WILLIAMS at which time he placed the bag in the front passenger seat of the BMW. Both subjects entered their respective vehicles and exited the area.
- 21. At approximately 1937 hours, Virginia investigators learned from CS-1 that WILLIAMS called HAYSPELL and stated "I'm just trying to run thru this, that was for 4 right?" HAYSPELL responded "Yeah for the three and the one I owed you". Virginia investigators believed HAYSPELL and WILLIAMS were discussing the recent CDS transaction.
- 22. On August 28, 2019, at approximately 10:51 p.m., CS-1 indicated that HAYSPELL and JONES were coordinating the purchase of five kilograms of cocaine from WILLIAMS at the Potomac Mills Shopping Mall in Woodbridge, Virginia. This cocaine purchase was to tentatively occur on the following day, August 29, 2019. CS-1 indicated that HAYSPELL was going to contact WILLIAMS immediately to begin coordinating the cocaine transaction. CS-1 indicated JONES contacted HAYSPELL and asked "he hit you back yet?" and that HAYSPELL replied "I ain't here nothing man." HAYSPELL then stated "I'm gonna call him".
- 23. On August 28, 2019, at approximately 10:55 p.m., CS-1 indicated that HAYSPELL contacted WILLIAMS to arrange for the purchase of five kilograms of cocaine on August 29, 2019. CS-1 revealed that WILLIAMS stated he was able to fulfill HAYSPELL's request of five kilograms

pr A of cocaine on August 29, 2019. HAYSPELL sent WILLIAMS a text message that read "4 and 1 regular". WILLIAMS then responded with a text message that read "when". HAYSPELL then stated in a text message "tomorrow if you ready" to which WILLIAMS responded back stating "ok".

- 24. Electronic surveillance of HAYSPELL indicated he was at a residence on Diggs Drive, Hampton, Virginia, 23666 during the above conversations with JONES.
- 25. On August 29, 2019, at approximately 9:30 a.m., members of the investigative team conducted physical surveillance of JONES and determined he was at his residence on Watchlight Road, North Chesterfield, Virginia, 23234.
- 26. On August 29, 2019, at approximately 11:45 a.m., CS-1 indicated that HAYSPELL contacted WILLIAMS and asked if they were going to meet today or the following day. WILLAIMS advised to meet in the am, which the investigative team believes is August 30, 2019.
- 27. On August 30, 2019, members of the investigative in Maryland were conducting surveillance of WILLIAMS' residence. WILLIAMS departed his residence and drove to a Home Depot in Prince George, County, MD. WILLIAMS parked his car and a Home Depot employee; later identified as DWAYNE CLARKE; walked to WILLIAMS' vehicle carrying an orange cooler bag and got in the passenger seat with WILLIAMS. A short time later both WILLIAMS and CLARKE exited the vehicle and stood around talking. WILLIAMS got back into his vehicle and left the area and CLARKE walked into the Home Depot with the orange cooler bag.
- 28. WILLIAMS was followed back to his residence in Millersville, Maryland. CS-1 advised the investigative team that WILLIAMS contacted HAYSPELL and advised he was ready to meet with JONES and distribute cocaine. CS-1 advised HAYSPELL contacted JONES and JONES advised he was getting ready to travel to Northern Virginia soon to meet with WILLIAMS.
- 29. At approximately 9:41 a.m., a Maryland state search warrant was executed at WILLIAMS' residence when he returned. During the search approximately 7 kilograms of suspected cocaine, a large amount of U.S. currency and a firearm were located at the residence.
- 30. At approximately 9:46 a.m., JONES was encountered during a traffic stop in Richmond, VA and found to be in possession of a cardboard box containing approximately \$160,000 in U.S. currency which was believed to be used to purchase cocaine from WILLIAMS.
- 31. At approximately 9:50 a.m., a Federal search warrant was executed at JONES' residence located at 6501 Watchlight Road, North Chesterfield, VA. During the search warrant a floor safe was located and found to contain approximately \$21,000 in U.S. currency.
- 32. Members of the investigative team returned to the Home Depot and approached CLARK. The orange cooler bag CLARK was seen carrying when he met with WILLIAMS was located in his employee locker and found to contain approximately 1 kilogram of suspected cocaine.
- 33. On August 30, 2019, CS-1 advised that MUNDELL was coordinating the shipment of a



marijuana package to Norfolk, VA.

- 34. On August 31, 2019, members of the investigative team determined that MUNDELL travelled to Hampton, VA from GA. MUNDELL was observed traveling to a residence in Norfolk, VA where CS-1 advised that a package containing marijuana was being delivered to that day. MUNDELL was observed arriving the residence and departing the residence. A traffic stop was conducted and a U.S. Mail package was observed in the back seat containing approximately 2 pounds of marijuana. The package was sent to the address that CS-1 had previously indicated to the investigative team.
- 35. On August 31, 2019, prior to MUNDELL being encountered by the investigative team while in possession of marijuana, CS-1 advised that MUNDELL planned to meet with SELWYN CLARKE in Virginia Beach, VA and breakdown narcotics into smaller amounts for distribution at SELWYN CLARKE's residence.
- 36. On August 31, 2019, at approximately 7;10 p.m., members of the investigative team executed a Virginia state search warrant at CLARKE's residence located on Waterfront Drive, Virginia Beach, VA 23451. During the search warrant approximately 675 grams of suspected cocaine and 18 pounds of marijuana was located and seized.

Based on the above, I believe that there is probable cause to believe that violations of Title 21, U.S.C., Sections 841 & 846 have been committed by DWIGHT WILLIAMS, QUINTON JONES, DWAYNE CLARKE, STEVE MUNDELL and SELWYN CLARKE.

Eric R. Jones

Special Agent

Homeland Security Investigations

Read and Approved:

Eric M. Hurt

Assistant United States Attorney

Sworn and subscribed to before me On this 3<sup>rd</sup> day of September 2019.

United States Magistrate Judge

Norfolk, Virginia

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